

The International Association for Exhibition Management (IAEM) is extremely concerned about the elimination of the 'existing business relationship' (EBR) exemption in this rule. IAEM represents 3,500 show organizers who produce the Top 200 trade shows in this country, representing a \$60 billion economic impact. As an example of the adverse effect these rules will present, a large show may have 3,000 exhibitors. Visitors to the show may be, in some instances, as high as 60,000. Communications between visitors, exhibitors, and show management consist of telephone, e-mail, and telefax. We believe this constitutes an existing business relationship.

As an organization, this rule will impact IAEM greatly. As an example, in many instances, members may have misplaced a membership dues notice and will ask us to fax them a copy. Under the new rules, we are not permitted to send the member a fax without prior written consent. Or, a person may want to place an order for a publication and will ask us to fax an order form, which we cannot do unless we have prior written consent. Or, a person may place an order over the phone for one of our products that has a custom imprint on it and we need to fax the person a proof for approval. Again, this is not permitted under the strict interpretation of the rules. Associations are in business to help their members succeed, and by their nature there existing a relationship between the member and the association.

Businesses today are doing more with less, just trying to succeed. Shouldn't government be an advocate for American businesses, rather than being a hindrance by its rules and regulations? These rules will result in needless busy work, when the focus should be on being profitable.

The International Association for Exhibition Management urges the FCC to stay the rules, gather input from the association industry and business, and modify the rules to include the existing business relationship exemption.

Thank you for your consideration,

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